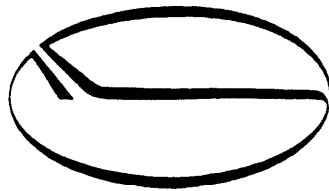


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Air Transport Association

January 20, 2000

FAA-99-6673-6

Admiral **Cathal Flynn**
Associate Administrator for Civil Aviation Security
Federal Aviation Administration
800 Independence Avenue, S. W.
Washington, D.C. 20591

Re: Notice of Proposed Rulemaking on Screening Company Certification
(Docket No. FAA 1999-6673, Notice 99-21)

Dear Admiral **Flynn**:

The Air Transport Association (ATA)¹ and the Regional Airline Association (RAA)², on behalf of our member airlines, are requesting a **90-day** extension of the comment period for the above-referenced Notice of Proposed Rulemaking. Comments would therefore be due to FAA on July 5, 2000. Given the length and complexity of the rule, it is unreasonable to expect that affected parties will be able to thoroughly analyze the operational and financial impact of the proposed regulations in the proposed **90-day** comment period.

Further, we believe that it is critical for the Federal Aviation Administration (FAA) to schedule a public meeting to inform the air carriers, screening companies and other **affected** parties about the provisions contained in the proposal and the agency's intention in proposing them. There are many entities, including small screening companies, that are unfamiliar with FAA's regulatory procedures, having never participated in a rulemaking process. The participation of these companies, which play a critical role in aviation security, is essential for a thorough vetting of the proposal. Additionally the proposal is lengthy, complex and written in regulatory verbiage, which may not be thoroughly understood by the affected parties, including air carriers. It is in the interest of FAA, as well as the aviation industry, to provide a detailed briefing of the elements contained in the **NPRM**.

¹ **ATA's** members are Airborne Express, Alaska Airlines, Aloha Airlines, America West Airlines, American Airlines, American Trans Air, Atlas Air, Continental Airlines, Delta Air Lines, DHL Airways, Emery Worldwide, Evergreen International, Federal Express, Hawaiian Airlines, Midwest Express, Northwest Airlines, Polar Air Cargo, Reeve Aleutian Airlines, Southwest Airlines, Trans World Airlines, United Airlines, United Parcel Service, and US Airways. ATA's associate members are Aeromexico, Air Canada, Canadian Airlines International, KLM--Royal Dutch Airlines, and Mexicana Airlines.

² The Regional Airline Association represents sixty short-haul scheduled airlines. RAA's member airlines transported 95 percent of the passengers carried by U.S. regional airlines in 1999.

January 20, 2000

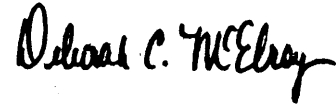
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Given the complexity of the **NPRM**, as well as the need to hold a public briefing on its elements, **ATA** and **RAA** believe there is sufficient justification to grant this request for a **90-day** extension to the comment period. We appreciate your consideration of this request and are willing to provide any additional information you might deem necessary.

Sincerely,



Richard J. Doubrava
Managing Director - Security
Air Transport Association of America



Deborah C. McElroy
Vice President
Regional Airline Association

cc: Jan **Brecht-Clark**, Director
Office of Civil Aviation Policy and Planning